

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

KNACK SYSTEMS, LLC)
)
 Plaintiff/Counter-defendant,)
)
 v.) Case No. 3:21-cv-07919
 TECH DENALI, LLC)
)
 Defendant/Counter-plaintiff.)

Via CM/ECF

Honorable Jessica S. Allen, U.S.M.J.
District of New Jersey
Martin Luther King Building and U.S. Courthouse
Courtroom 2B
50 Walnut Street
Newark, New Jersey 07102

November 10, 2022

**Re: Knack Systems, LLC v. TechDenali, LLC
Dkt. No. 21-cv-79219
Joint Letter Regarding Fact Discovery Pursuant to September 14, 2022 Letter
Order**

Dear Judge Allen:

Counsel for plaintiff Knack Systems, LLC (“Plaintiff”) and Tech Denali, LLC (“Defendant”) write pursuant to the Court’s September 14, 2022, letter order directing the parties to submit a joint status letter by today’s date addressing the status of the parties’ completion of fact discovery.

Regarding written discovery and settlement, Plaintiff produced amended interrogatory responses, written responses to Defendant’s production requests, and a supplemental document production on September 2, 2022. The parties met and conferred by telephone on September 13, 2022, regarding any outstanding discovery issues and the parties’ respective positions regarding settlement prior to the telephonic status conference held by the Court on September 14.

The parties are working to resolve the issues raised during the parties' September 13 meet-and-confer, and to conclude fact discovery by the current deadline of December 2, 2022. In addition, Defendant recently issued a subpoena to third-party TTI Consumer Power Tools, Inc. ("TTI") for a deposition currently scheduled for November 28, 2022.

We look forward to the parties' upcoming telephonic status conference with the Court, currently scheduled for November 17, 2022. Thank you for your Honor's attention to this matter.

Respectfully submitted,

By: /s/ Matthew I. W. Baker

Matthew I.W. Baker, Esq.
GENOVA BURNS LLC
494 Broad Street
Newark, New Jersey 07102
mbaker@genovaburns.com

RAJAN & RAJAN, LLP
Mahesh Rajan, Jr., Esq.
Eric B. Rochkind, Esq.
1419 Oak Tree Road
Iselin, New Jersey 08830
mahesh@rajanandrajan.com

Counsel for Plaintiff, Knack Systems LLC

By: /s/ Alexandra N. Prejzner

Thomas A. Christensen
Pro hac vice
Alexandra N. Prejzner
Pro hac vice
HUCK BOUMA PC
1755 South Naperville Road, Suite 200
Wheaton, Illinois 60189
630 221-1755
tchristensen@huckbouma.com
aprejzner@huckbouma.com

Iram P. Valentin
New Jersey Attorney I.D. No. 010222002
KAUFMAN DOLOWICH VOLUCK
Court Plaza North 25 Main Street, Suite 500
Hackensack, New Jersey 07601
Telephone: (201) 708-8233
Facsimile: (201) 488-6652
ivalentin@kdvlaw.com

Counsel for Defendant, Tech Denali, LLC